



Order Filed on November 12, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY  
COURT  
DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-2(c)

Mester & Schwartz, P.C.  
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1917 Brown Street  
Philadelphia, PA 19130  
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**In Re:**

**DOUGLAS A. REICHERT and MARY J.  
REICHERT,**

**Debtors**

Case No.: 19-20462-MBK

Judge: Michael B. Kaplan

**CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE  
2016 HONDA HR-V UTILITY 4D EX-L NAVIGATION AWD I4**

The relief set forth on the following pages, number two (2) through four (4) is hereby  
**ORDERED.**

**DATED: November 12, 2020**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

2

Debtors: Douglas A. Reichert and Mary J. Reichert  
Case No.: 19-20462-MBK  
Caption of Order: Consent Order Modifying Stay as To Personal Property

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1. The 11 U.S.C. § 362(a) Stay as to Capital One Auto Finance, a division of Capital One, N.A., its successors and/or assigns ("Movant"), with respect to the personal property of the Debtors described as a 2016 HONDA HR-V Utility 4D EX-L Navigation AWD I4, V.I.N. 3CZRU6H79GM730300, in accordance with the agreement of the Debtors and Movant, is hereby modified and shall remain in effect PROVIDED THAT Debtors comply with the following terms and conditions:

(a) Debtors are current with respect to post-petition payments that have come due through October 30, 2020.

(b) Debtors will resume making all future regular monthly installment payments of \$669.61 (subject to changes for taxes, insurance costs and late fees, if any) beginning on November 1, 2020; Debtors will timely make each payment in accordance with the terms and conditions of the loan document between Debtors and Movant.

2. Debtors will remain current on all payments ripe, due and owing under the terms of the Chapter 13 Plan. Debtors will pay Movant as an administrative expense through the Chapter 13 Plan the sum of \$306.00 for attorney's fees and costs.

3. The term "payment" as set forth in Paragraph 1, *supra*, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.

3

Debtors: Douglas A. Reichert and Mary J. Reichert  
Case No.: 19-20462-MBK  
Caption of Order: Consent Order Modifying Stay as To Personal Property

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4. Debtors will be in default under the Consent Order in the event that Debtors fail to comply with the payment terms and conditions set forth in Paragraph 1, *supra*. If Debtors fail to cure the default within thirty (30) days from the date of default, Movant may apply on five days' notice to Debtors and counsel for Debtors and the Chapter 13 Trustee for an order lifting the automatic stay imposed under 11 U.S.C. § 362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing a sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.

5. In the event Debtors convert to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtors shall pay all pre-petition arrears and post-petition arrears due and owing within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter. If Debtors fail to make payments in accordance with this paragraph, then Movant, through counsel, may file a Certification of Default setting forth said failure and Movant shall be granted immediate relief from the automatic stay provision of Section 362 of the Bankruptcy Code (11 U.S.C. § 362) and the Movant is then permitted to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing a sale of the motor vehicle.

4

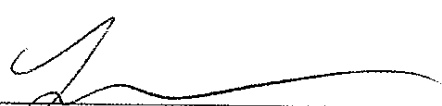
Debtors: Douglas A. Reichert and Mary J. Reichert  
Case No.: 19-20462-MBK  
Caption of Order: Consent Order Modifying Stay as To Personal Property


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6. The failure of Movant to issue a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

7. Debtors waive the fourteen (14) day stay provided under Rule 4001(a)(3), F.R.B.P.

**We hereby consent to the form and entry of the foregoing Order.**

  
\_\_\_\_\_  
Lee Martin Perlman, Esquire  
Lee M. Perlman  
1926 Greentree Road, Suite 100  
Cherry Hill, NJ 08003  
Attorney for Debtor

  
\_\_\_\_\_  
Jason Brett Schwartz, Esquire  
Mester & Schwartz, P.C.  
1917 Brown Street  
Philadelphia, PA 19130  
Attorney for Capital One Auto  
Finance, a division of Capital One, N.A.

In re:  
Douglas A. Reichert  
Mary J. Reichert  
Debtor(s)

Case No. 19-20462-MBK  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-3  
Date Rcvd: Nov 12, 2020

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 2

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 14, 2020:

Recip ID	Recipient Name and Address
db	+ Douglas A. Reichert, 747 Watchung Road, Bound Brook, NJ 08805-1429
jdb	+ Mary J. Reichert, 747 Watchung Road, Bound Brook, NJ 08805-1429

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 14, 2020

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 12, 2020 at the address(es) listed below:

Name	Email Address
Albert Russo	docs@russotrustee.com
Andrew L. Spivack	on behalf of Creditor CITIMORTGAGE INC. andrew.spivack@brockandscott.com, wbecf@brockandscott.com
Denise E. Carlon	on behalf of Creditor QUICKEN LOANS INC. dcarlon@kmlawgroup.com bkgroup@kmlawgroup.com
Jason Brett Schwartz	on behalf of Creditor Capital One Auto Finance a division of Capital One, N.A. jschwartz@mesterschwartz.com
Kevin Gordon McDonald	on behalf of Creditor QUICKEN LOANS INC. kmcdonald@kmlawgroup.com bkgroup@kmlawgroup.com

District/off: 0312-3

User: admin

Page 2 of 2

Date Rcvd: Nov 12, 2020

Form ID: pdf903

Total Noticed: 2

Lee Martin Perlman

on behalf of Joint Debtor Mary J. Reichert ecf@newjerseybankruptcy.com  
mcdoherty@ecf.courtdrive.com;hspivak@ecf.courtdrive.com

Lee Martin Perlman

on behalf of Debtor Douglas A. Reichert ecf@newjerseybankruptcy.com  
mcdoherty@ecf.courtdrive.com;hspivak@ecf.courtdrive.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 8